## EXHIBIT 15

## EDWARD BEARDEN 11/15/2018

	Page 1		Page 3
1	IN THE UNITED STATES DISTRICT COURT	1	IN THE UNITED STATES DISTRICT COURT
2	FOR THE WESTERN DISTRICT OF MISSOURI	2	FOR THE WESTERN DISTRICT OF MISSOURI
3	CENTRAL DIVISION	3	CENTRAL DIVISION
4	KAREN BACKUES KEIL,	4	KAREN BACKUES KEIL,
5	Plaintiff, Case No.	5	Plaintiff, Case No.
6	vs. 5:18-CV-06074-BP	6	vs. 5:18-CV-06074-BP
7	MHM SERVICES, INC., a	7	MHM SERVICES, INC., a
8	Virginia Corporation	8	Virginia Corporation
9	JOHN DUNN, and EDWARD	9	JOHN DUNN, and EDWARD
10	BEARDEN	10	BEARDEN
11	Defendants.	11	Defendants.
12	Defendants.	12	VIDEO-RECORDED DEPOSITION OF EDWARD
13	VIDEO-RECORDED DEPOSITION OF EDWARD BEARDEN	13	BEARDEN, produced, sworn and examined on November 15,
14	TAKEN ON BEHALF OF THE PLAINTIFF	14	2018, between the hours of 9:48 a.m. and 3:24 p.m. of
15	NOVEMBER 15, 2018	15	that day, at the State of Missouri Attorney General's
16	TO VEHISLIK 10, 2010	16	Office, Fletcher Daniels State Office Building, 615
17		17	E. 13th Street, Suite 401, Kansas City, Missouri
18		18	64106 before Angela R. Corkill, a Certified Court
19		19	Reporter (MO), Certified Shorthand Reporter (KS),
20		20	within and for the State of Missouri, in a certain
21	*	21	case now pending in the United States District Court
22		22	for the Western District of Missouri, Central
23		23	
24		24	Division, between KAREN BACKUES KEIL, Plaintiff, vs.
25		25	MHM SERVICES, INC., a Virginia Corporation; JOHN DUNN, and EDWARD BEARDEN Defendants; on behalf of the Plaintiff.
		23	and EDWARD BEARDEN Deterioritis, on behalf of the Flamini.
	Page 2	or and a second	Page 4
1	INDEX	1 2	APPEARANCES
2	WITNESS: PAGE:	3	APPEARING FOR THE PLAINTIFF:
3	EDWARD BEARDEN	4	Ms. Susan McGraugh Attorney at Law
4	Examination by Ms. McGraugh 7	5	Saint Louis University
5		6	100 N, Tucker Blvd., Suite 704 Scott Hall
6		7	St. Louis, Missouri 63101 314-977-7037
7	EXHIBITS		susan.mcgraugh@slu.edu
8	(None.)	8	
9			APPEARING FOR THE DEFENDANT BEARDEN:
10		10	Mr. Nicolas Taulbee
11.411.1-1		11	State of Missouri Attorney General's Office Fletcher Daniels State Office Building
11		1	
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12 13 14 15 16		13 14 15	Kansas City, Missouri 64106 816-889-5022 nicolas.taulbee@ago.mo.gov  APPEARING FOR THE DEFENDANT MHM SERVICES, INC.:  Ms. Carly Duvall Spencer Fane, LLP
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12 13 14 15 16 17 18 19 20 21 22		13 14 15 16 17 18 19 20 21 22	Kansas City, Missouri 64106 816-889-5022 nicolas.taulbee@ago.mo.gov  APPEARING FOR THE DEFENDANT MHM SERVICES, INC.:  Ms. Carly Duvall Spencer Fane, LLP 1000 Walnut, Suite 1400 Kansas City, Missouri 64106 816-292-8330 cduvall@spencerfane.com  APPEARING TELEPHONICALLY FOR THE DEFENDANT DUNN: Mr. Kevin J. Adrian Brown & James, PC 800 Market Street, Suite 1100

1 (Pages 1 to 4)

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1	A. No, ma'am. I wasn't aware that there	1	A.	Retirement pay.
2	are any fees. The way I understand it, it's the	2	Q.	Is that different between a pension
3	state that's being sued. The reason why I'm here is	3	and retire	ement pay?
4	because my name was mentioned.	4	A.	Well, I don't know. I'm not aware.
5	Q. So you don't think that there could be	5	i'm not s	ure. Pension would be retirement pay to me
6	any financial problems or financial judgment against	6	in the de	finition.
7	you?	7	Q.	How long did you work for Department
8	A. I hope not.	8	of Correc	tions?
9	Q. Okay. Do you have a union	9	A.	Nine years.
10	representative?	10	Q.	And when I say – use the term when
11	<ol> <li>No, ma'am, not that I'm aware of.</li> </ol>	11	does you	r pension vest, do you understand what I'm
12	Q. Okay. No one from Department of	12	asking?	
13	Corrections has reached out to you to discuss this	13	A.	You're vested after five years.
14	with you?	14	Q.	After five years, okay. At what
15	A. No, ma'am.	15	percenta	ge of pay, please?
16	Q. So tell me what happens after you have	16	A.	On the dollar amount?
17	the second PREA meeting and what happens afterwards.	17	Q.	Well, what so you get a pension
18	Because you separated from Department of Corrections;	18	after five	years. What are the terms of your
19	right?	19	pension?	
20	A. I retired August 31st.	20	A.	That is all in a scale. I don't know
21	Q. When did you make the determination	21	what tha	t would be.
22	that you'd retire August 31st?	22	Q.	Does your pension increase if you
23	<ul> <li>A. That was when my date on I turned</li> </ul>	23	retire wh	en you're older?
24	62 in July.	24	A.	As – if you stay longer –
25	Q. So when this was going on, it was also	25	Q.	Right.
	Page 50	The second secon		Page 52
1	your birthday; right?	1	A.	- it will, yes.
2	A. Yes, ma'am.	2	Q.	I was a public defender for eight
3	Q. Okay. So how does that happen? You	2		I have a little bit
2		3	years, so	
4	give notice?	4	years, so A.	Right, right.
	2 (491) 1 (1904)		A.	
4	give notice?	4	A. Q.	Right, right.
4 5	give notice?  A. Sure. Yes, ma'am.	4 5	A. Q. So you re	Right, right.  — of an idea about MOSER. All right.
4 5 6	give notice?  A. Sure. Yes, ma'am.  Q. When did you give your notice of retirement?	4 5 6	A. Q. So you re vested a	Right, right.  — of an idea about MOSER. All right.  etired after nine years. Your pension had
4 5 6 7	give notice?  A. Sure. Yes, ma'am.  Q. When did you give your notice of retirement?	4 5 6 7	A. Q. So you re vested a	Right, right.  — of an idea about MOSER. All right.  etired after nine years. Your pension had t five years. If you had stayed ten years,
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4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	give notice?  A. Sure. Yes, ma'am.  Q. When did you give your notice of retirement?  A. Probably in May or April.  Q. Is that — you do that — is that a paper notice?  A. Yes, ma'am.  Q. Tell me how you have to give that notice.  A. You have to go to MOSERS to make sure that everything is, you know, correct, and I guess they — they actually — after you fill out all the paperwork, they send a copy to the prison.  Q. And you're saying you filled out that paperwork in May?  A. May or June.  Q. Okay. When did the paperwork arrive	4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A. Q. So you revested a would you A. illness I consumer that Q. ten-year A. Q. A. Q. you woul in July? A. been that	Right, right.  — of an idea about MOSER. All right. etired after nine years. Your pension had to five years. If you had stayed ten years, at have gotten a larger pension?  I'm sure. I'm sure. With my wife's chose to go ahead — after we found out for a my wife was ill.  When was your ten — when would your date have been?  November.  November.  November 2018?  Mm-hmm.  So if you had resigned this November, do have gotten a larger pension than resigning Just a few dollars. Wouldn't have at much difference.
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Fax: 314.644.1334

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1	correct?	1	A. Yes, ma'am.
2	A. That's true. That's true.	2	Q. Did you did you choose to apply to
3	Q. Did you ever have occasion to take	3	Chillicothe or was that where you were assigned?
4	Karen to the to Ad Seg?	4	A. No. I chose Chillicothe.
5	A. No.	5	Q. Why did
6	Q. Transport her anywhere?	6	<ol> <li>Because I lived here in Chillicothe.</li> </ol>
7	A. No, no.	7	Q. Yeah, okay.
8	Q. Okay. Take her –	8	A. Excuse me.
9	A. Excuse me.	9	Q. Did you have any qualms about working
10	Q. Please, sir.	10	in a women's prison?
11	<ul> <li>A. That goes back to if you're not in</li> </ul>	11	A. No, no.
12	trouble, you're not going to Ad Seg, you know. I'm	12	Q. Are there any other prisons near
13	not - no, I've never escorted her anywhere.	13	Chillicothe where you could seek employment?
14	Q. And you recall specifically that you	14	<ul> <li>A. I could have at Cameron, I suppose,</li> </ul>
15	have not escorted her anywhere; correct?	15	but I chose not to. The drive, you know, an hour and
16	A. I don't remember escorting her	16	a half or whatever daily. I have worked in Moberly
17	anywhere. To my knowledge she's never been in	17	just we took an offender on dialysis, two
18	trouble. There's hundreds of other COs. Maybe -	18	officers. The female would stay with the offender in
19	maybe one of them did, you know, but, no, I have not.	19	the dialysis and the male would go work out, so I
20	Q. Okay. And you you know to a	20	have done that before.
21	certainty because you're testifying about it that you	21	Q. Yeah. So your contact, all contact
22	have not; correct?	22	you had with the women at Chillicothe was through
23	A. Exactly. That I have not. I don't	23	your employment at the Missouri Department of
24	know about anybody else. I can't speak for them, but	24	Corrections?
25	I have not.	25	A. Yes, ma'am.
	Page 186		Page 188
1	Q. Okay. And that's over what, nine,	1	Q. Okay. And your contact with Karen
2	nine years you were there?	2	Keil, Backues Keil, was through your employment with
3	A Professional Control of the Contro		Keil, backdes Keil, was ulfough your employment with
	A. Yes.	3	Department of Corrections –
4	A. Yes. Q. Okay. And you can recall that you	3 4	
4 5			Department of Corrections –
	Q. Okay. And you can recall that you	4	Department of Corrections –  A. Yes, ma'am.
5	Q. Okay. And you can recall that you never took her anywhere; correct?	4 5	Department of Corrections –  A. Yes, ma'am.  Q. – is that correct?
5 6	<ul><li>Q. Okay. And you can recall that you never took her anywhere; correct?</li><li>A. Correct.</li></ul>	4 5 6	Department of Corrections –  A. Yes, ma'am.  Q. – is that correct?  MR. TAULBEE: Let her finish.
5 6 7	<ul> <li>Q. Okay. And you can recall that you never took her anywhere; correct?</li> <li>A. Correct.</li> <li>Q. And you can recall that you never had</li> </ul>	4 5 6 7	Department of Corrections –  A. Yes, ma'am. Q. – is that correct?  MR. TAULBEE: Let her finish.  THE WITNESS: Pardon?
5 6 7 8	Q. Okay. And you can recall that you never took her anywhere; correct?  A. Correct. Q. And you can recall that you never had any bad interactions with her; correct?	4 5 6 7 8	Department of Corrections –  A. Yes, ma'am. Q. – is that correct?  MR. TAULBEE: Let her finish.  THE WITNESS: Pardon?  MR. TAULBEE: Let her finish before
5 6 7 8 9	Q. Okay. And you can recall that you never took her anywhere; correct?  A. Correct. Q. And you can recall that you never had any bad interactions with her; correct? A. Correct.	4 5 6 7 8 9	Department of Corrections –  A. Yes, ma'am. Q. – is that correct?  MR. TAULBEE: Let her finish.  THE WITNESS: Pardon?  MR. TAULBEE: Let her finish before you start answering.
5 6 7 8 9	Q. Okay. And you can recall that you never took her anywhere; correct?  A. Correct. Q. And you can recall that you never had any bad interactions with her; correct?  A. Correct. Q. And you can recall she's never had any	4 5 6 7 8 9	Department of Corrections —  A. Yes, ma'am. Q. — is that correct?  MR. TAULBEE: Let her finish.  THE WITNESS: Pardon?  MR. TAULBEE: Let her finish before you start answering.  THE WITNESS: Oh, I'm sorry.
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